

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	Case No. 24-31596
MMA LAW FIRM, PLLC,	§	Chapter 11
	§	
Debtor.	§	

CRISTÓBAL M. GALINDO, P.C. D/B/A GALINDO LAW,	§	
	§	
	§	
Plaintiff,	§	
	§	Adversary Proceeding No. 25-03310
vs.	§	
	§	
MMA LAW FIRM, PLLC,	§	
	§	
Defendant.	§	

**EMERGENCY UNOPPOSED MOTION OF
CRISTÓBAL M. GALINDO, P.C. D/B/A GALINDO LAW FIRM
TO TERMINATE SHOW CAUSE ORDER AND CANCEL RELATED HEARING**

(Relates to Docket No. 106)

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

Emergency relief is requested no later than Friday, August 15, 2025.

TO THE HONORABLE EDUARDO V. RODRIGUEZ
CHIEF UNITED STATES BANKRUPTCY JUDGE:

Cristóbal M. Galindo, P.C. d/b/a Galindo Law Firm (“**GLF**” or “**Galindo**”), by and through its undersigned counsel, hereby submits this Emergency Unopposed Motion of Cristóbal M. Galindo, P.C. d/b/a Galindo Law Firm to Terminate Show Cause Order and Cancel Related Hearing. In support thereof, Galindo would respectfully show as follows:

I. RELIEF REQUESTED AND BASIS THEREFOR

1. On July 17, 2025, the Court entered an Order at Docket No. 106 (the “**Order**”) that resolved the Motions on the Docket at Docket Nos. 57, 63, and 64 (together, the “**Motions**”).

2. In addition, Paragraph 4 of the Order scheduled a hearing on August 21, 2025 (the “**Hearing**”) relating to prosecution of the Motions.

3. Paragraph 6 of the Order further invited MMA Law Firm, PLLC (“**MMA**” or the “**Debtor**”) and Galindo to meet and confer to resolve issues raised in the Order.

4. The Parties have met and conferred and reached a joint resolution of the issues, which is memorialized in the Stipulation filed at Docket No 125 (the “**Stipulation**”).

5. As indicated therein, the Parties have resolved the issues referred to in Paragraph No. 6 of the Order and requested that the Court approve the Stipulation.

6. The Order further indicated that if the Parties resolved the issues discussed in the Order, the Court, at its discretion, may cancel the Hearing.

7. The Parties have requested that the Stipulation be approved; therefore, GLF, respectfully, requests this Court terminate the show cause Order and cancel the Hearing.

8. As stated in the Stipulation, MMA, through its attorneys, has been paid in full for prosecution of the Motions, is satisfied, and has no further desire or intention to prosecute the Order.

II. EMERGENCY CONSIDERATION

9. As this Court is aware, the Hearing is currently scheduled for August 21, 2025. GLF and GLF's counsel will require several days to prepare for the Hearing should it go forward and, accordingly, request that this Court, in light of Stipulation, terminate the show cause Order and cancel the Hearing as soon as possible in order to, hopefully, avoid unnecessary preparation.

III. PRAYER

WHEREFORE, GLF requests this Court enter an order: 1) granting the instant Motion; 2) terminating the show cause Order; 3) canceling the August 21, 2025 Hearing; and 4) granting such other relief as the Court deems just and proper.

Dated: August 13, 2025

Respectfully submitted,

HAYWARD PLLC

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- AND -

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**COUNSEL FOR Cristóbal M. GALINDO, P.C.
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CERTIFICATE OF CONFERENCE

I hereby certify that on August 13, 2025, I did confer with Johnie Patterson via telephone and he indicated he did not oppose the relief requested herein or having it heard on an emergency basis.

Charlie Shelton

Charlie Shelton

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on August 13, 2025, a true and correct copy of this Motion was filed with the Court and served via the Court's CM/ECF system upon all parties registered to receive such electronic service in this bankruptcy case, including the U.S. Trustee and the following parties.

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Charlie Shelton

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